

FILED
Clerk
District Court

DEC 15 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

1 JUSTICE JOHN A. MANGLONA, *PRO SE*
2 Supreme Court
3 Commonwealth of the Northern Mariana Islands
4 P.O. Box 502165
5 SAIPAN, MP 96950
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Case No. 05-0027

Plaintiff,

vs.

EX PARTE MOTION EXTENDING TIME
UNDER LOCAL RULE 7.1.h.3(b) AND
FED. R. CIV. P. 6 (b); APPLICATION FOR
INCREASE OF TIME UNDER LOCAL
RULE 7.1.h.2

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C.
FORELLI, WILLIAM C. BUSH, D.
DOUGLAS COTTON, L. DAVID SOSEBEE,
ANDREW CLAYTON, UNKNOWN AND
UNNAMED PERSONS IN THE CNMI
OFFICE OF THE ATTORNEY GENERAL,
ALEXANDRO C. CASTRO, JOHN A.
MANGLONA, TIMOTHY H. BELLAS,
PAMELA BROWN, ROBERT BISOM, AND
JAY H. SORENSEN,

Defendants.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.h.3(b)

As undersigned pro se Defendant, John A. Manglona (hereinafter sometimes referred to as
"Justice Manglona" or "Defendant"), certifies as follows:

1 a. The address and phone number of Plaintiff Bradshaw, who is without counsel, as listed
2 on his Amended Complaint is:

3 P.O. Box 473
4 1530 Trout Creek Road
5 Calder, Idaho 83808
6 Telephone: 208-245-1691

7 b. John A. Manglona is not represented by counsel. John A. Manglona's address and
8 relevant numbers are:

9 Supreme Court, Northern Mariana Islands
10 P.O. Box 502165
11 Saipan, MP 96950
12 Telephone: (670) 236-9800
13 Facsimile: (670) 236-9702

14 **FACTS SHOWING EXISTENCE AND NATURE OF THE CLAIMED EMERGENCY**
15 **OR REASON FOR *EX PARTE* APPLICATION**

16 Justice Manglona requests that this Court extend and enlarge his time to respond to Plaintiff's
17 Amended Complaint. Specifically, Justice Manglona seeks an enlargement up to and including
18 January 31, 2006 to file a dispositive motion or responsive pleading to the Plaintiff's Complaint.

19 Justice Manglona plans to retain local counsel but has not yet selected the appropriate
20 practitioner. He has been served improperly. Therefore, he reserves all defenses which he will
21 address in a dispositive motion under Fed. R. Civ. P. 12(b).

22 Plaintiff Bradshaw's complaint is eighty-one pages long and contains numerous causes of
action under an exhaustive list of federal civil and criminal statutes, including, among others, the
Racketeer Influence Corrupt Organizations Act, the Immigration Reform and Control Act and

1 numerous Federal Civil Rights causes of action. Adequately responding to all of Plaintiff Bradshaw's
2 allegations will require a large expenditure of resources and time. Accordingly, Justice Manglona
3 needs additional time to retain local counsel who can properly address Plaintiff Bradshaw's allegations
4 and file a responsive pleading or dispositive motion.

5 Currently, the deadline for Justice Manglona to respond individually is December 22, 2005.
6 Considering the time it will take to find local counsel to hire and the time it will take to adequately
7 respond to the Amended Complaint, he believes an extension to January 31, 2006 is warranted here.

8
9 **PLAINTIFF BRADSHAW WAS NOTIFIED, BUT HAS YET TO BE SERVED WITH
THIS MOTION**

10 On December 6, 2005, Supreme Court Law Clerk Deborah Fisher contacted Plaintiff Bradshaw
11 by telephone to obtain a fax number where Justice Manglona could make a request for an extension of
12 time. At 10:45 a.m., Ms. Fisher spoke with Plaintiff Bradshaw, who informed her that he did not have
13 access to a fax machine. Plaintiff Bradshaw did agree orally to extend my time to January 31, 2006.
14 Because Plaintiff Bradshaw resides in Idaho, and considering the time it takes for regular mail to travel
15 to Idaho, it will be difficult to obtain a stipulation memorializing this agreement in a timely manner.
16 Therefore, this application is submitted within the federally required due date for papers.

17
18 **APPLICATION TO INCREASE TIME PURSUANT TO LOCAL RULE 7.1.h.2**


19 Based upon the facts set forth herein, Justice Manglona makes this application to increase his
20 time to respond and states: a) no other extensions of time have been sought in this matter by Justice
21 Manglona (The AG has sought and been granted an extension previously. Those Defendants had
22 deadlines ranging from November 22, 2005 through December 7, 2005 unlike Justice Manglona herein

1 whose first deadline is December 22, 2005); b) the reasons for this extension are set forth herein; and
2 c) granting this extension would not affect any scheduled dates of which Justice Manglona is aware.

3 WHEREFORE, based upon the foregoing, Justice Manglona respectfully requests that this
4 Court grant Justice Manglona's Ex Parte Motion Extending Time and enter an Order extending
5 deadline for filing a dispositive motion or responsive pleading to the Plaintiff Bradshaw's Complaint
6 until January 31, 2006.

7 Dated this 14th day of December, 2005.

8
9 Respectfully submitted,

10 
11 JUSTICE JOHN A. MANGLONA
12 *Pro Se*